	IN THE WILLEBO STATES UPORSTAIN DESTRICT OF MARYLAND	DISTRICT COURT OF MARYLAND
A. DIAS RAMOS, et	al., 2002 JUL -3 A 10: 43	Civil Action No. WMN 01-CV-2742
Plaintiffs,	CLERK'S OFFICE () AT BALTIMORE ()	en e
VS.	DEPUTY)	
TENNSMITH, INC.,	)	
Defendant.	, )	

## STIPULATION STAYING DISCOVERY AND EXTENDING TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT

The parties hereby stipulate and agree that discovery shall be stayed until the Court decides Defendant Tennsmith, Inc.'s Motion for Summary Judgment, which was filed on Friday, June 24, 2002.

The parties further stipulate and agree that Plaintiffs shall have through and including July 15, 2002, within which to file a response to Tennsmith's Motion for Summary Judgment, provided that the response brief is transmitted by e-mail on July 15, 2002 and all exhibits are served via overnight courier, next morning delivery to all defense counsel, and Tennsmith shall have through July 26, 2002, within which to file a Reply.

STIPULATED AND AGREED TO BY:

SCALDARA & POTLER, LLP

Donald J. Walsh

One North Charles Street, Suite 1200

Baltimore MD 21201 410-752-5000 x 13 Counsel for Plaintiffs OBER|KALER, A PROFESSIONAL CORPORATION OBER, KALER, GRIMES & SHRIVER, ATTORNEYS AT LAW

Jøhn M.G. Murphy

120 East Baltimore Street

Baltimore, MD 2/202-1643

Telephone 410-685-1120

CHAMBLISS, BAHNER & STOPHEL, P.C.

John G. Jackson, pro hac vice 1000 Tallan Building

Two Union Square

Chattanooga, TN 37402

Telephone: 423-756-3000

Counsel for Defendant

APPROVED this \_\_\_\_\_\_\_ day of \_\_\_

**United States District Judge** For the District of Maryland



Ober, Kaler, Grimes & Shriver Attorneys at Law

120 East Baltimore Street Baltimore, MD 21202-1643 410-685-1120 / Fax 410-547-0699 www.ober.com John M. G. Murphy jmmurphy@ober.com 410-347-7334

**Offices In**Maryland
Washington, D.C.
Virginia

July 2, 2002

## VIA HAND DELIVERY

Hon. William M. Nickerson
Judge
United States District Court
for the District of Maryland
U.S. Courthouse, Room 330
101 W. Lombard Street
Baltimore, Maryland 21201

Re: A. Dias Ramos, et al.

v. Tennsmith, Inc.

U.S.D.C. Md. Civil No.: WMN01-CV-2742

Dear Judge Nickerson:

I enclose a courtesy copy of a Stipulation Staying Discovery and Extending Time to Respond and Motion for Summary Judgment, the original of which has been filed with the Clerk of the Court today. I have executed the Stipulation on behalf of Donald Walsh with his permission. This Stipulation renders the Motion to Stay Discovery or Alternatively, for Protective Order pending before this Court moot, as it in essence reaches the same result as that requested by the Motion.

Thank you for your kind consideration of this matter.

Sincerel

M.G. Murphy

JMGM/ds Enclosure

cc: Donald J. Walsh, Esq. (w/encl.)
 John G. Jackson, Esq. (w/encl.)

Clerk (for file)